CORRES. CONTROL INCOMING LTR NO.

Q1 LQ2 RF 95

States Government

Department of Energy

orandum MR II 2 13 PHR 8 Eky Flats Field Office

DATE

DUE

**ACTION** APR 0 7 1995 EG&G ROCKY FLATS PLANT CORRESPONDENCE GGATEGE

DAVIS, J.G. FENN, T.M.

FERRERA, D.W FRAY, R.E.

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STROBEL, G.L. TURNER, K.A. VOORHEIS, G.M

DIST. LTR ENC BURLINGAME, A.H. ER:WNF:08259 CARNIVAL, G.J. CORDOVA, R.C.

Operable Unit No. 15 Proposed Plan Comments

Mr. Richard J. Ray, Project Manager Operable Unit No. 15 EG&G Rocky Flats, Inc.

Thank you for the opportunity to review the draft Proposed Plan for Operable Unit No. 15.

I am well pleased with the response to my comments on earlier drafts. I have a few more issues to raise with the latest draft. They are attached with this letter.

If you should have any questions or require any additional explanation, please contact me through extension 4013.

William N. Fitch

OU 15 Project Manager **Environmental Restoration** 

BAY RICHARD

Attachment SCHURBE

cc w/ Attachment: PRIMAGSE D. Schubbe, EG&G

> cc w/o Attachment: F. Lockhart, DAMER J. Wienand, ER

A. Primrose, EG&G

CORRES. CONTROL | X | X ADMN RECORD/080 PATS/T130G

Reviewed for Addressee Corres. Control RFP

GOOD

Ref Ltr. #

DOE ORDER # 5400. /

**United States Government** 

# Department of Energy Rocky Flats Field Office

## memorandum

DATE:

APR 0 7 1995

REPLY TO ATTN OF:

ER:WNF:08259

SUBJECT:

Operable Unit No. 15 Proposed Plan Comments

TO:

Mr. Richard J. Ray, Project Manager

Operable Unit No. 15 EG&G Rocky Flats, Inc.

Thank you for the opportunity to review the draft Proposed Plan for Operable Unit No. 15.

I am well pleased with the response to my comments on earlier drafts. I have a few more issues to raise with the latest draft. They are attached with this letter.

If you should have any questions or require any additional explanation, please contact me through extension 4013.

William N. Fitch

OU 15 Project Manager Environmental Restoration

Attachment

cc w/ Attachment:

sa w/a Attachment

cc w/o Attachment: F. Lockhart, DAMER J. Wienand. ER

A. Primrose, EG&G

### W. N. Fitch's Comments on the OU-15 Draft Proposed Plan Dated March 14, 1995

#### Major Items

Page 4, column 2, line 10 — The phrase "... evaluating if unacceptable levels of risk exist to persons working inside the buildings." is not correct. I think it should say "... evaluating if the IHSSs pose unacceptable levels of risk to the workers."

Page 4, The ARAR's Box — I generally like the appearance and content of the box except:

- (1) Do we need to distinguish between ARARs and TBCs?
- (2) Can we dismiss Sec. 265.381 and Sec. 265.404? That is, did we demonstrate that the solid waste removed was not a hazardous waste or is our position that none was removed?
- (3) Why are 29CFR1910.96 (e), (f), (g), (h) and (i) missing?
- (4) Is 40CFR196 correct or should it be 40CFR191?

Page 5, column 2, line 11 — Suggest inserting "... without additional controls." after "radiation protection standards."

#### NITS

The following are suggestions and are not major problems...

Page 1, column 1, para. 3, line 7 — I think that the word "large" is a better choice than "larger."

Page 1, column 2, para. 2, line 1 — I would insert "... radiation control..." after "The..."